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10 Attorneys for Plaintiff Dawn A Carter

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13 **UNITED STATES DISTRICT Court**  
14 **DISTRICT OF NEVADA**

15 DAWN A CARTER,

16  
17 Plaintiff,

18 vs.

19 NANCY A. BERRYHILL, Acting  
Commissioner of Social Security,

20 Defendant.  
21

} Case No.: 2:18-cv-01415-GMN-VCF  
}  
} STIPULATION TO EXTEND TIME  
} OF TIME TO FILE MOTION FOR  
} REMAND/REVERSAL  
}  
} (FIRST REQUEST)

22 Plaintiff Lisa Anderson and Defendant Nancy A. Berryhill, Acting  
23 Commissioner of Social Security, through their undersigned attorneys, stipulate,  
24 subject to this court's approval, to extend the time from November 8, 2018 to  
25 January 3, 2019, for Plaintiff to send her Motion for Remand/Reversal with all  
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1 other dates in the Court's Scheduling Order extended accordingly. This is  
2 Plaintiff's first request for an extension. This request is made at the request of  
3 Plaintiff's counsel to allow additional time to fully research the issues presented.  
4 Counsel requests the extension due to an abnormally heavy hearing calendar which  
5 included four administrative hearings and one oral argument at the United States  
6 District Court level in the last six days. Two of Counsel's administrative hearings  
7 required travel exceeding 50 miles each way. Despite Counsel's attempt to finalize  
8 the briefing by the deadline, Counsel will require additional time to complete the  
9 briefing in this matter. Counsel sincerely apologizes for any inconvenience this  
10 request may have caused to the Court, its staff, and all parties involved.

11 DATE: November 8, 2018      Respectfully submitted,

12                                      LAW OFFICES OF LAWRENCE D. ROHLFING

13                                      /s/ / *Cyrus Safa*

14 BY: \_\_\_\_\_

15                                      Cyrus Safa  
16                                      Attorney for plaintiff Dawn A Carter

17 DATE: November 8, 2018

18                                      DAYLE ELIESON  
19                                      United States Attorney

20                                      /s/ Marcelo N. Illarmo

21 BY: \_\_\_\_\_

22                                      Marcelo N. Illarmo  
23                                      Special Assistant United States Attorney  
24                                      Attorneys for defendant Nancy A. Berryhill  
25                                      Acting Commissioner of Social Security  
26                                      [\*authorized by e-mail]

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DATED: 11/9/18

IT IS SO ORDERED: 

UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:18-CV-01415-GMN-VCF**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on November 8, 2018.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Cyrus Safa*

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Cyrus Safa  
Attorneys for Plaintiff

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